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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
ORLANDIS WELLS, M.D.,
Defendant.

CASE NO.: 2:19-cr-00216-ART-NJK1

NOTICE OF INTENT TO CALL
EXPERT WITNESS AT TRIAL

DR. ORLANDIS WELLS, by and through his Attorney, CHRISTOPHER R. ORAM, hereby gives notice of its intent to call an expert witness to testify at the trial in this matter, currently set to begin at a time no sooner than March 7, 2023, as set forth herein. The Defense reserves the right to modify or supplement this Notice, as circumstances warrant.

SUMMARY OF EXPERT WITNESS OPINION AND QUALIFICATIONS

Pursuant to Fed. R. Crim. P. 16(b)(1) and Fed. R. Evid. 702, Dr. Wells hereby provides notice of its intent to call at trial, Dr. Danial Laird, M.D., Esq., whose curriculum vitae is attached as Exhibit B, and which sets forth the basis of his expertise.

Dr. Laird will testify at trial as to the opinion set forth in his written report, attached as Exhibit A. These are “reports of examinations or tests” within the meaning of Rule 16 (b)(1)(B).

1 In providing this expert testimony, Dr. Laird reviewed and relied upon, among other
2 items, certain files of Dr. Wells' former medical patients included in discovery; in the criminal
3 indictment (ECF No. 1), these patients correspond to Patients A-O (Counts 1-32).

4 Dr. Laird is the medical director of Flamingo Medical Clinic, a primary care, addiction,
5 and pain management clinic. Dr. Laird is a licensed physician, and has practiced pain
6 management nearly continuously since 1996. Dr. Laird holds a Doctor of Medicine Degree from
7 the University of Washington, completed his residency at the University of Washington School
8 of Medicine – Seattle, and completed a one-year fellowship in pain management at the same
9 institution. Dr. Laird's full CV is attached as Exhibit B.

10 In his report, Dr. Laird strongly contests the assertions made in the report authored by
11 Dr. Jeffery Muir, the Government's expert witness, and the report authored by Dr. Timothy
12 Munzing, which is included in discovery. Dr. Laird's report reviews the information that would
13 have been available to Dr. Wells, and states that based on this information, Dr. Wells made
14 reasonable and legitimate efforts to treat the patients listed in the indictment. Additionally, Dr.
15 Laird finds that nothing in information available to him would suggest that Dr. Wells had
16 anything other than a desire to aide the patient. Dr. Laird's full report is attached as Exhibit A.

17 Dr. Laird will receive compensation for his work in this case, as set forth in the fee
18 schedule attached to his report, and separately attached as Exhibit C.

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1 Dr. Laird, as indicated in his fee schedule, has previously testified in the following
2 cases:

3 Dillard v. Harko, LLC d/b/a Harbor Island Aparments, et al.
Romans v. Prebyterian Healthcare Services, Deposition
4 Marty v. Malin Deposition, Trial
Regidor v. Pacificare, Deposition
5 Roth v. Talik, Deposition
Jones v. Southern Hills Hospital, Deposition
6 Hernandez Mendez v. Loper Enterprises, Deposition
Martinez v. Silver et al. Deposition
7 Mesa v. Schindler Elevator, Inc., et al.
Murdock v. Duncan Attwood, et al.
8 Johnson v. Villagran
Goldklang v. Toia
9 Sinohui v. ATS Specialized

10 Dr. Wells reserve the right to modify or supplement the areas of Dr. Laird's testimony as
11 circumstances warrant.

12 DATED: February 6th, 2023.

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14 /s/ Christopher R. Oram
Christopher R. Oram, Esq.
Nevada Bar No. 4349
15 520 S. Fourth Street, Second Floor
16 Las Vegas, NV 89101
Attorney for Dr. Wells

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of February, 2023, I served a true and correct copy of the foregoing document entitled **NOTICE OF EXPERT WITNESS** to the United States Attorney's Office and all other parties associated with this case by electronic mail as follows:

NADIA AHMED, ASSISTANT UNITED STATES ATTORNEY
Nadia.Ahmed2@usdoj.gov

STEVEN MYHRE, ASSISTANT UNITED STATES ATTORNEY
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By: /s/ Scott Reynolds Egnor
An employee of Christopher R. Oram, Esq.